



## DAMAGES

2. If you answered “yes” for any claim or claims in question 1, what is the amount of damages Apple should pay Wi-LAN for infringement of the asserted patents?

A lump sum payment of \$ 145.1 million

**OR**

A per-unit royalty payment of \$ \_\_\_\_\_, calculated as follows:

$$\frac{\text{Number of units}}{\text{Per-unit amount}} \times \frac{x}{=} \frac{\text{Total damages}}$$

Dated: 8-1-2018

Charles E. Cole  
FOREPERSON